

REMARKS

Claims 1-4, 6-14, 16-19 and 21-27 have been examined. Claims 17, 23 and 27 have been amended. Reconsideration of the claims in view of the following remarks is respectfully requested.

Initial Remarks

Counsel for the Applicants wishes to thank the Examiner for the interview of September 12, 2006. An Interview Summary form has been provided by the Examiner.

Claim Rejections - 35 U.S.C. § 103

Claims 1-4, 6-14, 16-19 and 21-27 have been rejected under 35 U.S.C. §103 as being unpatentable over Stewart. This rejection is respectfully traversed.

As discussed in the interview, independent claim 1 includes two general categories of steps. One category is the creation of a reference designator based on the association of two separate sender identifications. In other words, if the senders for two money transfer requests are highly related, they are assigned a reference designator.

The second category of steps searches the money transfer requests which have reference designators for fraudulent activity. In this way, the fraud test is run on only a portion of all money transfer requests, thus significantly reducing computer processing time.

In contrast to the method of claim 1, the Stewart reference describes a wide variety of fraud tests. However, these tests are done for each transaction. Nowhere in Stewart is there any teaching of first creating reference designators for related transactions and then running fraud tests on those transactions. Indeed, a fraud check must be done on every transaction because the customer is creating a financial account electronically and a check needs to be

performed to see if the funds to be loaded onto the account are good funds. See paragraphs 0006-0007.

Hence, claim 1 and dependent claims 2-4 and 6-14 are distinguishable without amendment.

Independent claim 16 claims a process where a money transfer record is associated with a reference designator. As described above, Stewart fails to teach any kind of process where reference designators are created. Hence, claim 16 is distinguishable without amendment.

Independent claim 17 includes steps which produce a reference designator list, then searches this list for suspicious money transfer activities. As such, claims 17-19, 21 and 22 are distinguishable for at least the reasons previously described.

Independent claim 23 has been amended to clarify that the money transfer requests are grouped based on user identification similarities before a fraud test is performed. Hence, claim 23 is distinguishable over Stewart.

Independent claim 24 claims a system which is configured to create a reference designator list so that this list can be analyzed without affecting the performance of the system. As described above, nowhere in Stewart is such a process taught or suggested. Hence, claims 24-26 are distinguishable.

Independent claim 27 has been amended to clarify how the money transfer requests are grouped and that the fraud test is run on the clustered records. As such, claim 27 is distinguishable over the Stewart reference.

Conclusion

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

Date: September 22, 2006

/Darin J. Gibby/
Darin J. Gibby
Reg. No. 38,464

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, CA 94111-3834
Tel: 303-571-4000
Fax: 415-576-0300
DJG/jln
60868557 v1